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April 17, 2009

TO: Stakeholders Interested in the  
NPDES General Permit for Bulk Petroleum Storage Facilities

FROM: Melinda G. Vickers, Environmental Engineer Associate  
Industrial Wastewater Permitting Section  
Water Facilities Permitting Division

RE: Draft General Permit SCG340000

The South Carolina Department of Health and Environmental Control (SCDHEC) has drafted a National Pollutant Discharge Elimination System (NPDES) permit for the above referenced facility, based on the NPDES permit applications submitted to SCDHEC for each covered facility.

The enclosed draft permit contains proposed conditions to be incorporated into an NPDES permit. Proposed changes to the current permit include, however, may not be limited to:

1. The "boilerplate" conditions (Parts I-V) of the permit have been updated and reformatted to match the regulation and current format of other NPDES permits.
2. The permit has been restructured to eliminate categories and include all FW limits together, SW limits together and pages added for FW-SW limits which did not previously exist.
3. An erosion prevention requirement has been added for hydrostatic testing events. This requirement was taken from the NPDES General Permit for Hydrostatic Test Water Discharges, SCG670000.
4. A requirement to minimize exposure to pollutants has been added. This requirement is a generic best management practice to prevent pollutants from entering waterways. It was taken from the NPDES General Permit for Storm Water Discharges Associated with Industrial Activity, SCR000000.
5. The requirement for two (2) samples of each hydrostatic test water discharge has been eliminated.
6. The allowance of a monitoring and record-keeping exemption by hydrostatic discharges of less than 3000 gallons has been removed. All discharges must be recorded and reported.
7. Limits on the minimum pH have been added to make sure all discharges to State waters comply with water quality standards. An additional condition about changes in pH from natural conditions has been added in cases where waters have pH outside the normal range.

8. Wastewater treatment operator and inspection frequency requirements have been standardized for all facilities covered by the permit. There is no longer an allowance for varying requirements among facilities covered by the permit.
9. New limits have been added to the permit for a number of parameters and changed from the previous permit for other parameters. A schedule of compliance has been added for the new zinc limit based on DMR data submitted for existing facilities.
10. The monitoring requirements for several parameters have changed based on a review of where each pollutant may be suspected to be present at the facility.
11. Iron has been removed from the permit due to the removal of iron from the water quality standards.
12. Compliance values have been added to the permit for parameters with limits below the PQL and those that require monitoring only so that data may be collected at a sufficiently sensitive PQL to determine the presence (or absence) of a given pollutant.
13. The numbering of outfalls at a facility with more than one outfall will follow the pattern of F01 for the first outfall (or SO1, X01, as appropriate), F11 for the second outfall, F21 for the third, etc. This nomenclature may be different than was in your previous permit.
14. As it relates to the proposed limits for each facility, please review the table in Attachment 7 for products and additives stored on-site and the handling of wastewater and storm water associated with each item stored and transferred. The table in Attachment 7 was compiled using previous permit requirements and permit applications. Also, see the section at the end of this memo relating to facility-specific questions for information needed to accurately describe some of the discharges.
15. A table of proposed limits for each outfall at each facility based on this draft permit is included in Attachment 6. Please carefully review the proposed limits for your facility based on the items stored/transferred. Provide comments and justification for any changes that you think should be made to the proposed limits. Upon permit issuance, each facility will be provided a DMR form that indicates the parameters to be sampled and the appropriate limits for your facility.
16. To assist the Department in evaluating the discharges from each facility, I have created a new NOI form that will replace the former submittal of a Form 2C, categorization form, etc. Please complete the attached NOI so that coverage under the new permit will be appropriately determined and documented. You are not required to perform additional sampling of your discharges to report on the NOI form. However, please report the latest effluent sampling results you have for any parameters you did sample and indicate the date of the sampling event.
17. Hydrostatic test water: Based on a review of DMR data, it appears that there are different interpretations of how to report discharges of hydrostatic test water. While the existing permit does not specifically address this issue, the intent is to have the discharge of hydrostatic test water reported with the DMR on the same outfall during the same reporting period if it goes out the same outfall as the other wastewaters at the facility. Per the information in the permit

applications, there was no facility that indicated a need for a separate discharge of hydrostatic test water alone. Please provide any updates to this information if what I have listed is not correct for your facility (see Attachment 7). Sampling for the discharge may include a combination of flows or just a discharge of one or the other components at any given time. Regardless, the appropriate DMR form shall be completed for the applicable discharge and shall be submitted during the appropriate monitoring period, not based on the date of the hydrostatic test event. The pollutants that vary with dilution will be included on two different DMR forms, one for your "normal" discharge and the other for the large (>50% flow increase) hydrostatic testing discharges. The limits on these pages are different and compliance with limits will be determined based on the discharge flow used for that monitoring period. You will be required to fill in the appropriate DMR with your sampling data and enter "conditional" for the other DMR not used during that period. Both forms will be required to be submitted each monitoring period.

18. All items in the limitations pages without footnotes are to be sampled by every covered facility during each monitoring period. This includes discharges of hydrostatic testing of new tanks and pipes if such testing is performed during a monitoring period.
19. Below are some facility-specific issues that need to be addressed. Additional or revised permit requirements may be needed based on responses to these items.

SCG340001: Your September 28, 2007 renewal application transmittal letter indicates you wish to begin discharging storm water and wash water from truck loading and washing areas. I have previously sent email messages to Jil Norman on 3/12/08 and 2/4/09 asking for more information, but none has been received. Please let me know if you still plan to make these changes so that appropriate permit limits may be determined. The information in this package does not include these additional items. Confirmation is needed before they can be added to either the current permit or the revised permit upon permit renewal.

SCG340006: The current permit coverage is for one outfall. The permit application submitted for renewal, indicates there are two outfalls with basically the same discharges. Please clarify whether one or two outfalls exist and the components of each discharge. This may be done on the new NOI form with an accompanying response for explanation.

SCG340015: Please describe black liquor and the potential pollutants that may be associated with it.

SCG340020: The current permit coverage for this facility has limitations and monitoring requirements for utility water. There is no indication of utility water in the permit application submitted for renewal of the permit. Please clarify whether these wastewaters are present or not. This may be accomplished using the new NOI form.

SCG340022: The September 20, 2007 renewal application transmittal letter from Shaw Environmental for this facility requests coverage for a discharge from the railcar loading area oil/water separator into a manhole sump that runs along the fence. The letter also indicates that the facility plans to abandon the discharge pipe to the sump and tie in to the other existing on-site oil/water separator. Please explain what the current situation with these discharges is. The

information in this submittal does not include a second outfall because confirmation is needed before it can be added to either the existing permit or the reissued permit. A second outfall may not need to be added if sampling of both discharges can be accomplished after treatment and mixing of the two waste streams, but prior to the receiving stream.

Acceptance of the conditions of this draft permit, or any specific objections, is required in writing to this office before the close of the public comment period. You will receive separate notification from the Department of the public notice period, but we anticipate it beginning in the first or second week of May 2009. After the close of the comment period, assuming no public hearing is requested, a response to comments will be developed and the changes made in the permit will be provided to each stakeholder.

If you have any questions about the permit, please contact me at 803-898-4186 or at [vickermg@dhec.sc.gov](mailto:vickermg@dhec.sc.gov).

Enclosures: Draft permit, Fact Sheet, Attachments

cc w/o encl: NPDES Permit Administration

cc w/ encl: EPA Region IV

cc w/ encl via email: BOW/WPC Enforcement  
BOW/Compliance Assurance Section  
All EQC Districts  
Vernon Beaty, BOW  
Industrial Wastewater Permitting Section